

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

1121 Pier Village LLC., *et al.*¹

Debtors.

Chapter 11

Case No. 21-11466 (ELF)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Thomas D. Bielli, Esquire and Bielli & Klauder, LLC hereby enters their appearance pursuant to Bankruptcy Rules 2002 and 9007 and 11 U.S.C. §102(1) and all other applicable law as counsel of record for the Debtors 1121 Pier Village LLC (21-11466-ELF), 2626 Frankford LLC (21-11467-ELF), 193 Hancock LLC (21-11468-ELF), 231 E 123 LLC (21-11469-ELF), 285 Kingsland LLC (21-11470-ELF), and Penn Treaty Homes LLC (21-11471-ELF) in the above-referenced case, and hereby request that copies of all notices and pleading given or filed in this case be given and served upon the following:

Thomas D. Bielli, Esquire
BIELLI & KLAUDER, LLC
1905 Spruce Street
Philadelphia, PA 19103
Phone: (215) 642-8271
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery,

¹ 2626 Frankford LLC (21-11467-ELF), 193 Hancock LLC (21-11468-ELF), 231 E 123 LLC (21-11469-ELF), 285 Kingsland LLC (21-11470-ELF), and Penn Treaty Homes LLC (21-11471-ELF).

telephone, telegraph, telex, or otherwise filed or made with regard to the above-referenced case and all proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this entry of appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive any rights of 1121 Pier Village LLC, 2626 Frankford LLC, 193 Hancock LLC, 231 E 123 LLC, 285 Kingsland LLC, and Penn Treaty Homes LLC: (i) to have final orders in non-core matters entered only after *de novo* review by a United States District Court judge; (ii) to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related to this case; (iii) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which 1121 Pier Village LLC, 2626 Frankford LLC, 193 Hancock LLC, 231 E 123 LLC, 285 Kingsland LLC, and Penn Treaty Homes LLC, are or may be entitled under any agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

BIELLI & KLAUDER, LLC

Dated: October 6, 2021
Philadelphia, Pennsylvania

/s/ Thomas D. Bielli
Thomas D. Bielli (202100)
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*Proposed counsel for 1121 Pier Village LLC,
2626 Frankford LLC, 193 Hancock LLC, 231 E
123 LLC, 285 Kingsland LLC, and Penn Treaty
Homes LLC*